

## **Veracity Networks**

### **STATEMENT EXPLAINING HOW THE COMPANY'S OPERATING PROCEDURES ENSURE COMPLIANCE WITH THE FCC'S CPNI RULES**

#### **PREFATORY STATEMENT:**

During 2018, Veracity Networks did not utilize or provide CPNI for any purpose other than those purposes that are permissible without customer approval in accordance with 47 CFR §64.2005 of the FCC's Rules and Regulations. *Veracity Networks does send annual opt-out notices meeting the requirements of 47 CFR § 64.2007 (see attached Exhibit A). The status of individual customer CPNI approval is evidenced in Veracity Networks' customer account and billing database which flags the account and individual lines (where applicable) with CPNI approval status. Veracity Networks has elected not to utilize or provide CPNI for any purposes requiring express or opt-in approval.*

#### **I. Customer Proprietary Network Information ("CPNI")**

The law affords privacy protections for two kinds of information related to Veracity Networks as a telecommunications carrier: (1) information about the quantity, technical configuration, type, destination, location, and amount of use of a telecommunications service subscribed to by any customer, and (2) information contained in the bills pertaining to telephone exchange service or telephone toll service received by a customer.

That information, when matched to a name, address, and telephone number is known as "Customer Proprietary Network Information" or "CPNI" for short. Examples of CPNI include information typically available from telephone-related details on a monthly bill such as the types of services purchased by a customer, numbers called, duration of calls, directory assistance charges, and calling patterns. (CPNI does not include names, addresses, and telephone numbers, as this information is considered subscriber list information under applicable law).

#### **II. Use of CPNI Is Restricted**

Veracity Networks recognizes that CPNI privacy concerns have led Congress and the FCC to impose restrictions upon its use and disclosure, and upon the provision of access to it by individuals or entities inside and outside our company.

Veracity Networks has designated its Vice President of Customer Service as the CPNI Compliance Officer responsible for: (1) communicating with our company attorneys and/or consultants regarding CPNI responsibilities, requirements and restrictions; (2) supervising the training of company employees and agents who use or have access to CPNI; and (3) receiving, reviewing, and resolving any questions or issues arising within our company regarding use, disclosure, or provision of access to CPNI; including but not limited to specific marketing by Veracity Networks and its affiliates.

Company employees and agents that may deal with CPNI have been informed that

there are substantial federal restrictions upon CPNI use, distribution and access. In order to be authorized to use or access the company's CPNI, employees and agents must receive training with respect to the requirements of Section 222 of the Communications Act and the FCC's CPNI Rules (Subpart U of Part 64 of the FCC Rules).

### **III. Permissible Uses of CPNI**

Veracity Networks employees and agents are strictly prohibited from using CPNI, and from providing CPNI to individuals or entities inside or outside the company, except as follows:

1. Veracity Networks may, after receiving an appropriate request from a customer, disclose or provide the customer's CPNI to any person or entity designated by the customer. Any and all such customer requests: (1) must be made in writing; (2) must include the customer's correct billing name and address and telephone number; (3) must specify exactly what type or types of CPNI must be disclosed or provided; (4) must specify the time period for which the CPNI must be disclosed or provided; and (5) must be signed by the customer.

2. In the absence of an appropriate written request from the customer, Veracity Networks may still provide the customer's phone records or other CPNI to a law enforcement agency in response to a warrant or subpoena that specifies the particular CPNI to be furnished.

3. Veracity Networks may use, disclose or permit access to CPNI to provide the same category of telecommunications service to a customer from which the CPNI is derived. For example, we may use the CPNI from our provision of local exchange service to a customer to provide or market new, additional or modified local exchange service offerings to the customer. Likewise, we may use the CPNI from our provision of long distance toll service to a customer to provide or market new, additional or modified long distance toll service offerings to the customer.

4. Veracity Networks and its authorized employees may use, disclose or permit access to CPNI to provide services necessary to, or used in, the provision of the telecommunications service from which the CPNI is derived.

- a. The FCC has noted the publishing of directories as an example of this permitted use.

- b. The FCC has indicated that telecommunications carriers may use, disclose or permit access to CPNI, without customer approval, to provide inside wiring installation, maintenance, and repair services. In these instances, CSR, Network engineer, technician, and dispatcher employee involvement with CPNI is utilized within the FCC guidelines.

- c. The FCC has stated that local exchange carriers and commercial mobile radio service providers may use CPNI, without customer approval, to market "adjunct-to-basic" services such as speed dialing, computer-provided directory assistance, call monitoring, call tracing, call blocking, call return, repeat dialing, call tracking,

call waiting, caller ID, call forwarding, and certain Centrex features.

d. Any other use, disclosure or provision of CPNI under this "necessary to or used in the provision of" category must be expressly approved in writing by Veracity Networks' CPNI Compliance Officer.

5. Veracity Networks, its authorized employees and its billing agent may use CPNI to initiate, render, bill, and collect for telecommunications services. Such use may include periodic review of customer statements for accuracy and completeness.

6. Veracity Networks may use CPNI to protect company rights or property, and to protect users and other carriers from fraudulent, abusive or illegal use of (or subscription to) the telecommunications service from which the CPNI is derived.

7. Veracity Networks may use, disclose, or permit access to CPNI derived from its provision of local exchange service or interexchange service, without the customer's approval, to provide customer premises equipment ("CPE"), call answering, voice mail or messaging, voice storage and retrieval services, fax store and forward, and protocol conversion.

8. If a customer subscribes to more than one category of service offered by Veracity Networks, we are permitted to share CPNI among its affiliated entities that provide a service offering to the customer. If a customer does not subscribe to more than one offering, Veracity Networks is not permitted to share CPNI with its affiliates without the customer's consent pursuant to the notice and approval procedures set forth in 47 CFR § 64.2007, 47 CFR § 64.2008, 47 CFR § 64.2009 and 47 CFR § 64.2010 of the FCC's Rules.

9. When an existing customer calls Veracity Networks to inquire about or order new, additional or modified services (in-bound marketing), we may use the customer's CPNI to assist the customer for the duration of the customer's call based upon opt-out approval. In the absence of opt-out approval the Veracity Networks will proceed with the use of customer CPNI only after the customer is provided with oral notice required by 47 CFR § 64.2008(c) and 47 CFR § 64.2008(f) of the FCC's Rules, and only if provided with positive ID or account password. This one-time oral approval is documented on the customer account and does not replace the existing CPNI account status unless the customer requests such change.

10. Veracity Networks has adopted a policy that it will limit the use, disclosure, or access to CPNI in connection with company (and affiliate) initiated marketing to those expressly allowed by 47 CFR § 64.2007 by opt-out authority only. Veracity Networks will not utilize CPNI for purpose requiring express or opt-in approval.

#### **IV. CPNI Compliance Officer**

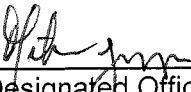
In addition to the specific matters required to be reviewed and approved by Veracity Networks' CPNI Compliance Officer, employees and agents are strongly encouraged to bring any and all other questions, issues or uncertainties regarding the use, disclosure, or access to CPNI to the attention of the our Compliance Officer for appropriate investigation, review and guidance. The extent to which a particular

employee or agent brought a CPNI matter to the attention of the CPNI Compliance Officer and received appropriate guidance is a material consideration in any disciplinary action brought against the employee or agent for impermissible use, disclosure or access to CPNI.

## **V. Disciplinary Procedures**

Veracity Networks has informed its employees and agents that it considers compliance with the Communications Act and FCC Rules regarding the use, disclosure, and access to CPNI to be very important.

Violation by company employees or agents of such CPNI requirements will lead to disciplinary action (including remedial training, reprimands, unfavorable performance reviews, probation, and termination), depending upon the circumstances of the violation (including the severity of the violation, whether the violation was a first time or repeat violation, whether appropriate guidance was sought or received from the CPNI Compliance Officer, and the extent to which the violation was or was not deliberate or malicious).

  
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Designated Officer  
Veracity Networks